

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

CARL RAGASA AND KANANI
RAGASA,

Plaintiffs,

vs.

COUNTY OF KAUAI, KAUAI FIRE
DEPARTMENT, DAVID SPROAT,
ROBERT KADEN, SIDNEY KINI,
AND ETHAN SAGE,

Defendants.

CV. NO. 03-00540 BMK

DECLARATION OF CORLIS J.
CHANG; EXHIBITS “1” – “3”

DECLARATION OF CORLIS J. CHANG

I, CORLIS J. CHANG, state on oath:

1. That I am a partner in the law firm of Goodsill Anderson Quinn & Stifel, counsel for Defendants County of Kaua’i, Kaua’i Fire Department, David Sproat, Robert Kaden and Sidney Kini in this matter. If called to testify, I could testify as to the matters stated herein.

2. Attached hereto as Exhibit “1” are true and correct copies of the transcripts of the Deposition of Carl Ragasa, Volume III, taken on

January 14, 2005.

3. Attached hereto as Exhibit “2” are true a correct copies of the transcripts of the Deposition of Carl Ragasa, Volume II, taken on October 13, 2004.

3. Attached hereto as Exhibit “3” is a true and correct copy of a letter dated November 10, 2003 from Charles Brewster of the US Lifesaving Association to Carl Ragasa which was authenticated by Mr. Ragasa at his deposition on October 13, 2004.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawai‘i, January 13, 2006.

/s/ Corlis J. Chang

CORLIS J. CHANG